

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Document Page 1 of 5



Order Filed on January 21, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

In Re:
LTL Management LLC

Case No.: 21-3058+9

Adv. No.:

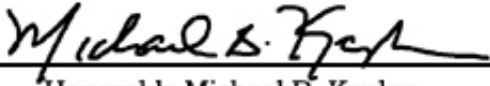
Hearing Date:

Judge: Michael B. Kaplan

**JOINT STIPULATION AND AGREED ORDER BETWEEN THE OFFICIAL COMMITTEE OF
TALC CLAIMANTS I AND THE OFFICIAL COMMITTEE OF TALC CLAIMANTS II
REGARDING PLEADINGS PREVIOUSLY FILED**

The relief set forth on the following page is hereby **ORDERED**.

DATED: January 21, 2022


Honorable Michael B. Kaplan
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

**JOINT STIPULATION AND AGREED ORDER BETWEEN
THE OFFICIAL COMMITTEE OF TALC CLAIMANTS I AND
THE OFFICIAL COMMITTEE OF TALC CLAIMANTS II
REGARDING PLEADINGS PREVIOUSLY FILED**

The relief set forth on the following pages is hereby **ORDERED**.

This stipulation and agreed order (this “Stipulation”) is made on this 11th day of January, 2022 (the “Stipulation Date”) by the Official Committee of Talc Claimants I (the “TCC I”) and the Official Committee of Talc Claimants II (the “TCC II”) regarding pleadings previously filed in the above-captioned chapter 11 case (the “Case”) of LTL Management LLC, the debtor and debtor-in-possession (the “Debtor”) in the Case.

Recitals

WHEREAS, on October 14, 2021, the Debtor filed a voluntary petition for chapter 11 relief in the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division (the “NC Bankruptcy Court”) [[Docket No. 1](#)];

WHEREAS, on November 8, 2021, the NC Bankruptcy Court entered an order appointing the Official Committee of Talc Claimants (the “Initial Joint Committee”) [[Docket No. 355](#)];

WHEREAS, on November 16, 2021, the NC Bankruptcy Court entered an order transferring venue of the Case to the United States Bankruptcy Court for the District of New Jersey (the “Court”) [[Docket No. 416](#)];

WHEREAS, on December 23, 2021, Andrew R. Vara, the United States Trustee for Region 3 (the “U.S. Trustee”), filed a notice reconstituting and amending the Initial Joint Committee and appointing the TCC I and the TCC II [[Docket No. 965](#)]; and

WHEREAS, prior to the Stipulation Date, the Initial Joint Committee advanced several motions, pleadings, and related court filings in this Case implicating the interests of both the TCC I and the TCC II.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. All motions, pleadings, and related court filings in this Case filed by the Initial Joint Committee prior to the Stipulation Date, whether in the NC Bankruptcy Court or the Court, other than retention applications, shall be deemed filed separately by each of the TCC I and the TCC II (the “Prior Initial Joint Committee Motions”).

2. TCC I and the TCC II shall each have the discretion to determine and pursue the manner in which each such Committee may prosecute (or not prosecute) any of the Prior Initial Joint Committee Motions.

3. This Stipulation shall constitute the entire agreement and understanding of the TCC I and the TCC II relating to the subject matter hereof and supersedes all prior agreements and understandings between the TCC I and TCC II relating to the subject matter hereof.

4. The Court shall retain jurisdiction to resolve any disputes, controversies, or ambiguities arising from this Stipulation.

AGREED AS TO FORM AND SUBSTANCE:

**SHERMAN, SILVERSTEIN,
KOHL, ROSE & PODOLSKY, P.A.**
*Proposed Local Counsel to the
Official Committee of Talc Claimants II*

GENOVA BURNS, LLC
*Proposed Local Counsel to the
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Dated: January 11, 2022

Dated: January 11, 2022